

EPA COMMENTS – AUGUST 3, 2016

Lower Passaic River Study Area River Mile 10.9 Post-Construction Monitoring Quality Assurance Project Plan

Revision 2

Dated April 2016

<u>No.</u>	<u>General Comments</u>
1	The term “approximately” should be inserted before each sample depth interval reference, if it has not already been done so.

<u>No.</u>	<u>Page No.</u>	<u>Specific Comments</u>
2	Title page	Update revision date
3	List of Acronyms, Page 2 of 3	“pg” is wrongly defined in the list of acronyms as “pictogram”. Change to “picogram” in all related acronyms.
4	List of Acronyms, Page 3 of 3	Capitalize the “p” in the “PRC” definition
5	Introduction, Data Quality Objectives, Page 2 of 12, last paragraph, second sentence	This section of the QAPP provides language referencing two planned monitoring events. Revise this language to reflect physical monitoring of the cap following episodic events (in addition to the planned events). Make this change throughout the document in applicable sections. EPA notes that potential additional physical and chemical monitoring following the “5 year” event will be determined following EPA’s review of the available monitoring data.
6	QAPP Worksheet #3 (UFP-QAPP Manual Section 2.3.1) Distribution List, Page 1 of 1	Revise the EPA Remedial Project Manager (RPM) to be Jennifer LaPoma.
7	QAPP Worksheet #8 (UFP-QAPP Manual Section 2.4.4) Special Personnel Training Requirements Table, Page 1 of 2	EPA notes that the training dates for the new AECOM personnel, Helen Jones, may be different than those of the former personnel, Ryan McCarthy. EPA requests that these dates be verified.
8	QAPP Worksheet #10 (UFP-QAPP Manual Section 2.5.2) Problem Definition, Page 1 of 1	Revise the last sentence to read “The QAPP will be updated, as necessary, for this second event based on the results of this initial monitoring event and any advancements in porewater monitoring technology or techniques.” Make similar changes throughout the document in applicable sections.

9	QAPP Worksheet #11 (UFP-QAPP Manual Section 2.6.1) Project Quality Objectives/Systematic Planning Process Statements, Page 3 of 15, DQO 1, Timeframe	Revise this section to also include physical monitoring after episodic events. Make similar changes throughout the document in applicable sections.
10	QAPP Worksheet #11 (UFP-QAPP Manual Section 2.6.1) Project Quality Objectives/Systematic Planning Process Statements, Page 8 of 15, DQO 2, Step 2, Decision Statements on Confirmation of the Cap Modeling Predictions and Cap Long-term Effectiveness, first bullet point	Revise the bullet point as follows: "If COPCs are not detected in the porewater within the cap active layer and the cap armor layer, then the CapSim modeling results are supported at this time. EPA will determine the frequency of further data collection efforts after review of the data obtained as part of this QAPP, and with consideration of the 17-mile RI/FS."
11	QAPP Worksheet #11 (UFP-QAPP Manual Section 2.6.1) Project Quality Objectives/Systematic Planning Process Statements, Page 9 of 15, DQO 2, Step 4, Geographic Area	Revise the second sentence to read "Currently, the porewater passive sampler and surface sediment samples will be collected from ten locations spatially distributed across the cap in areas representative of cap conditions that are accessible by walking across the cap."
12	QAPP Worksheet #16 (UFP-QAPP Manual Section 2.8.2) Project Schedule/Timeline Table, Page 1 of 1	Revise this table to reflect any new estimated delivery dates.

13	QAPP Worksheet #17 (UFP-QAPP Manual Section 3.1.1) Sampling Design and Rationale, Page 2 of 3, first paragraph	Revise the following statement “On December 1, 2015, USEPA provided proposed new sample locations based on USEPA evaluation of accessible locations based on projected water levels” to read as follows “On December 1, 2015, EPA in collaboration with the CPG proposed adjusted sample locations based on projected water levels and the CPG’s stated field constraints (e.g, accessing locations on foot, no in-water work or wading, etc.).”
14	QAPP Worksheet #17 (UFP-QAPP Manual Section 3.1.1) Sampling Design and Rationale, Page 2 of 3, second paragraph	Revise this paragraph to read “This approach results in a density of sampling locations of 2.3 per acre (10 locations in 4.3 acres of capped area, not including duplicate and QA/QC samples).” The additional information in the original paragraph is not relevant to the QAPP or implementation monitoring activities and should be deleted.
15	QAPP Worksheet #17 (UFP-QAPP Manual Section 3.1.1) Sampling Design and Rationale	Revise the text to state that the portion of the sampler extending above the sediment surface will be cut down to as close as possible to the sediment surface (and the tubing capped) to lessen the potential for the sampler to be damaged by debris or ice.